**Department of Veterans Affairs**
**FREEDOM OF INFORMATION ACT (FOIA)**
**REPORT FOR FISCAL YEAR 2006**

## XII. REPORT ON IMPLEMENTATION OF EXECUTIVE ORDER 13392.

This section of the annual FOIA report contains the Department of Veterans Affairs' description of its progress in implementing the milestones and goals of its FOIA Implementation Plan. The reporting period for this section includes progress made by the Department through January 2007.

A. In November 2006, the Department of Veterans Affairs modified its FOIA implementation plan (copy attached). This modification added two additional Backlog Reduction milestones to the basic plan. The first new milestone was establishment of a Quarterly Backlog Snapshot reporting requirements for all field activities. This milestone requires each of VA's 300+ field activities to count and report its total number of backlogged FOIA requests to the Agency Chief FOIA Officer on a selected day each quarter. The second new milestone was establishment of a requirement for each field activity to submit information regarding its ten oldest backlogged FOIA requests quarterly. The data required includes date received, reason(s) for the delay, and a projected completion date.

B. Report on agency implementation of its plan, including its performance in meeting milestones, with respect to each improvement area

VA has met all of the goals and milestones that were to be completed during this reporting period.

On January 13, 2006, the Assistant Secretary for the Office of Information and Technology (OI&T) was designated as VA's Agency Chief FOIA Officer (ACFO). VA's Records Management Service, a staff element within the OI&T, was designated as the responsible office to implement the provisions of EO 13392 throughout the agency, in conjunction with other VA Administrations and staff offices that administer and manage FOIA requests.

In February 2006, VA established a planning FOIA working group to identify any known deficiencies or improvements needed within their FOIA operations and to establish a roadmap for eliminating deficiencies and making improvements. The VA FOIA working group identified accountability, reporting, management oversight, automation and

technology, and intra-agency communication as areas needing improvement.  The working group also called for: continued evaluation of the existing FOIA organization structure; an analysis of existing policy, guidelines and regulations; and a training program tailored to VA's unique circumstances

In addition to meeting all CY 2006 milestones, VA has made substantial progress on a number of its CY 2007 milestones. Milestone met include: Designation of the VA ACFO; Creation of FOIA Requester Service Centers and Public Liaisons; Establishment of  Department-wide FOIA working group; Conducting a preliminary assessment of VA's FOIA Program; Identifying problems, deficiencies and recommendations; Presentation of findings to ACFO; Drafting revisions and updates to agency FOIA regulations and policies; Standardization of initial Notice of Determination response; Implementation of quarterly backlog snapshot reporting requirements for all field activities; Analyzing quarterly backlog snapshots to identify offices with significant backlogs; Identification of VA's 10 oldest FOIA requests and estimated completion dates using Snapshot data.

The improvements resulting from meeting these milestones have been significant.  Increased management emphasis on backlog reduction has brought a reduction of over 50% in the number of backlogged cases between the September and November 2006 snapshot samples.

Milestones scheduled for achievement during the remainder of CY 2007 include: Identifying new resources and funding requirements; Finalizing & publishing revised/updated agency regulations and policies; Analyzing the annual FOIA report to identify offices with backlogs; Soliciting and analyzing in-depth backlog data calls from selected field facilities; Examining procedures in offices with backlogs; Continuing to identify frequently requested records and post them on the VA FOIA web site; Identifying possible backlog solutions; developing a plan to reduce FOIA Backlog and implementing the backlog solutions; Establishing a FOIA Processing Organization (VA FOIA Office); Reviewing existing personnel job series and position descriptions for FOIA Officers and other FOIA Personnel; Establish baseline skills and knowledge for FOIA Officers; Establishing a requirement for annual training and awareness initiatives; Designing a comprehensive FOIA Training Program targeted for all primary and alternate VA FOIA Officers; Investigating web-based and/or video training; Implementing a Training Program for FOIA Officials and Staff; and Continuing FOIA site Visits.

C. Identification and discussion of any deficiency in meeting plan milestones (if applicable)

Not applicable

D. Additional narrative statements regarding other executive order-related activities (optional)

Not applicable

E. Concise descriptions of FOIA exemptions

The nine exemptions to the FOIA authorize federal agencies to withhold information covering: (1) classified national defense and foreign relations information; (2) internal agency rules and practices; (3) information that is prohibited from disclosure by another federal law; (4) trade secrets and other confidential business information; (5) inter-agency or intra-agency communications that are protected by legal privileges; (6) information involving matters of personal privacy; (7) records or information compiled for law enforcement purposes, to the extent that the production of those records (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions, or (F) could reasonably be expected to endanger the life or physical safety of any individual; (8) information relating to the supervision of financial institutions; and (9) geological information on wells.

F. Additional Statistics:

1. Time range of requests pending, by date of request (or, where applicable, by date of referral from another agency).

   March 6, 2000 to January 3, 2007

2. Time range of consultations pending with other agencies at this time.

   January 20, 2004 to January 3, 2007

G. Attachment: Agency improvement plan:

[The FOIA Implementation Plan](#) for the Department of Veterans Affairs is attached.

**U.S. Department of Veterans Affairs (VA)**
**Freedom of Information Act (FOIA) Implementation Plan under**
**Executive Order (EO) 13392, Improving Agency Disclosure of Information**


## A. Agency's FOIA Operations

In FY 2005, VA processed 1,914,013 FOIA requests, the most processed by any federal agency. The majority of the requests were first party Privacy Act requests for records stored electronically that could be processed quickly. The remaining were traditional FOIA requests, which required more extensive processing. VA FOIA operations are decentralized, meaning a FOIA request may be processed by any of the approximately 400 VA offices within the United States, American Samoa, Guam, Philippines, Puerto Rico, and the Virgin Islands that maintain the records requested. Our Federal implementing regulations, Title 38 of the Code of Federal Regulations (CFR) § 1.553(b) require that requests be made in writing, over the signature of the requester, and must contain a reasonable description of the requested record. Recent VA annual FOIA reports have identified Veterans Health Administration (VHA), Veterans Benefits Administration (VBA), Office of the Inspector General (OIG), Office of Acquisition and Materiel Management (OA&MM) and Board of Veterans Appeals (BVA) as the components that routinely process the largest volume of VA FOIA requests.

On January 13, 2006, the Assistant Secretary for the Office of Information and Technology (OI&T) was designated as VA's Agency Chief FOIA Officer (ACFO). VA's Records Management Service, a staff element within the OI&T, is the responsible office to implement the provisions of EO 13392 throughout the agency, in conjunction with other VA Administrations and staff offices that administer and manage FOIA requests.

In February 2006, VA issued a call to the Under Secretaries, Assistant Secretaries, and other key VA officials explaining the need to establish a planning FOIA work group that would identify any known deficiencies or improvements needed within their FOIA operations. The areas identified for review are listed in Section B. Those areas identified as requiring improvement are listed in Section D. As planning efforts evolve, other VA FOIA offices may participate in the decisions made as a result of EO 13392, "Improving Agency Disclosure of Information."

## B. Areas Selected for Review

1) FOIA Organization Structure
   a. Accountability
   b. Reporting
   c. Management oversight
   d. Intra-agency communication

2) FOIA Governance
   a. Review existing policy, guidelines and regulations
   b. FOIA processing procedures

3) FOIA Backlog
   a. Causes
   b. Categories

4) FOIA Training
   a. Position and level specific training
   b. Organization specific training

5) FOIA Customer Service and Communications
   a. FOIA status tracking
   b. Customer satisfaction

The following issues were reviewed and discussed but dismissed as inappropriate for inclusion in this report.

- **Receive FOIA requests by email**: VA regulations do not provide for requesters to submit FOIA requests by email. More importantly, the working group found that receiving requests by email is not likely to be viable for an agency of this size that serves such a large population.

- **Establish customer satisfaction metrics:** VA's FOIA policy office and FOIA operations are separate and distinct (There are severe coordination problems because of the separation of functions and there is a lack of consistency and an inability to address issues.) Having multiple entry points for the customer makes it impractical to establish a centralized mechanism to handle or discuss customer complaints or issues

- **Contracting out/hiring contract employees**: An increasing number of agencies have made good use of either contracting out certain limited FOIA-related activities or hiring contract employees for FOIA work, or both. The working group, however, determined that this is not a significant issue in light of the areas for improvement discussed in this plan.

- **Uniform Tracking System:** An electronic tracking system that all offices throughout the agency will adopt was presented as a way to consistently track requests agency-wide. However, the types of requests and issues that the different VA components receive vary widely. For example, VHA processes mostly requests for electronic medical records, while VBA receives many requests for veterans' claims folders, which contain paper records that are sometimes decades old. Because these components have their own tracking systems that have been adapted to their specific needs, a uniform tracking system that will impose one standard across the agency was dismissed as impracticable.

## C.    Results of Review

A need for enhanced FOIA Organization Structure, FOIA Governance, Backlog reduction, FOIA Training, Technology and Automation, and improved Customer Service and Communication were identified.

**D.     Areas Chosen as Improvement Areas**

    1) FOIA Organization Structure
        a.  Accountability
        b.  Reporting
        c.  Management oversight
        d.  Intra-agency communication

    2) FOIA Governance
        a.  Policy, guidelines and regulations
        b.  FOIA processing procedures

    3) FOIA Backlog
        a.  Causes
        b.  Categories

    4) FOIA Training
        a.  Position and level specific training
        b.  Organization specific training

    5) FOIA Customer Service and Communications
        a.  FOIA status tracking
        b.  Customer satisfaction

    6) Technology and Automation

The areas identified by the VA FOIA working group as improvement areas for the agency plan include continued evaluation of the existing FOIA organization structure and improvement in the areas of accountability, reporting, management oversight and intra-agency communication. Analysis of existing policy, guidelines and regulations is needed. In addition, position and level specific training would help reduce existing backlogs.  The area of VA FOIA automation and technology was identified as needing improvement. Suggested improvement in these areas could make FOIA processing more efficient and address many of the issues concerning customer satisfaction.

**E. Improvement Area Plans**

**1) FOIA Organization Structure**

**a.  Goals, Objectives, and Improvements Sought**

An Acting VA Chief FOIA Officer has been designated and FOIA Request Service Centers and Public Liaisons have been established.  VA FOIA processing is decentralized, however, modifying the existing organizational structure and establishing a FOIA Office within the agency will improve FOIA processing through development of top-to-bottom accountability

and reporting, which will allow active management oversight and intra-agency communication.  Currently, most VA FOIA Officers perform their FOIA responsibilities as a collateral duty.   They gather requested records and are often the subject-matter experts who process the request as promptly as possible.  The planned improvements will provide customers and the FOIA Public Liaisons with a central point of contact for all VA FOIA matters for the agency.   This will require an agency commitment to invest the appropriate resources for aligning staff, investing in new technology, and training.

   **b. Steps Planned or Taken** *(✓ indicates complete)*

- ✓ Designate Chief FOIA Officer
- ✓ Create FOIA Requester Service Centers and Public Liaisons
- ✓ Establish Depart-wide FOIA Working Group
- ✓ Conduct Preliminary Assessment of VA's FOIA Program
- ✓ Identify problems, deficiencies and recommendations
- ✓ Present findings to ACFO
- ▪ Establish a FOIA Processing organization

**c.  Milestones**

See Organization Structure milestones at table below.

**d.  Means of Measurement of Success**

Successful completion of items listed in E.1.b.

**2)  FOIA Governance**

**a.  Goals, Objectives, and Improvements Sought**

VA regulations, guidelines and handbooks need to be updated.  The regulations predate the Electronic FOIA Amendments of 1996, and the current handbook was written in 1998.  Therefore, VA currently does not have written departmental guidance on multi-track or expedited processing.  The regulations and policies need to be updated to address the E-FOIA Amendments, as well as the changes in procedure specified in this plan. In addition to examining guidelines and policy, an analysis of staffing levels and position descriptions of FOIA personnel is needed.   Improvements will standardize VA FOIA practices, incorporate FOIA functions into position descriptions and clearly identify staffing needs.

**b.  Steps Planned or Taken**

- ▪ Identify new resource and funding requirements
- ▪ Draft revised and updated agency regulations and policies
- ▪ Revise and update agency regulations and policies
- ▪ Finalize and Publish revised/updated agency regulations and policies

- Review existing personnel job series and position descriptions for FOIA Officers and other FOIA Personnel.
- Restructure VA's Headquarter FOIA Requester Service Center Office and Public Liaison Officers.

### c. Milestones

See Governance milestones at table below.

### d. Means of Measurement of Success

Successful completion of items listed in E.2.b.

3) **FOIA Backlog Reduction.** A backlog consists of those requests pending for longer than the twenty-day statutory time limit for response. There are 276 offices within VA that routinely receive FOIA requests. Each one of these annually receives a volume of FOIA requests ranging from 1 to almost 52,000. While over 99% of VA FOIA requests are processed in 2-days or less, there are requests that require coordination / consultation with multiple VA Offices, departments, and other agencies and a FOIA backlog does exist.

### a. Goals, Objectives, and Improvements Sought

A number of organizations within VA have FOIA officers that perform FOIA functions as a collateral duty. This may be a contributing factor to the backlog. If a determination is made at that the workload would justify converting FOIA Officer's duties from a collateral assignment, a decision may be made to authorize staff to perform the FOIA function full-time.

Inadequate training of newly appointed FOIA Officers may contribute to the backlog as well. VA enhanced training plan is described in paragraph 3 above.

Affirmative disclosure of public information that does not fall under subsection (a)(2) of the FOIA, is permitted. VA policy statements, staff manuals and instructions to staff, and final agency opinions provide for such proactive disclosures to be made readily available to the public, including through posting on the web-site. A centralized FOIA tracking system, as discussed in the Automation & Technology section below, would permit easy identification of frequently requested materials properly posted in the FOIA electronic reading room. This may reduce the backlog by permitting FOIA officers to direct the customers to the web-site.

### b. Steps Planned or Taken to reduce FOIA Backlog

- Analyze Annual FOIA Report to identify offices with backlogs
- Examine the procedures in offices with backlogs
- Identify frequently requested records and post them on the VA FOIA web site

- Call memorandum to all Field entities to provide backlog stats on September 11 and November 30, 2006
- Selected Field Facilities will complete a FOIA Data Call, which will request in-depth data on their FOIA process to include factors they believe would impact or cause a backlog and the possible solutions. Included in the Data Call will be facilities that have significant backlogs and some with little to no backlog in order to do a comparison between the two populations.
- Data Call results will be analyzed and categorized by causes, solutions, Administrations as well as agency wide; based on this analysis, a proposed reduction for backlog will be determined and the proposed effective date
- VA will identify its 10 oldest FOIA requests and provide their estimated completion dates. The completion dates will be included in the status update on the VA Implementation Plan.
- Conduct site visits of selected facilities identified as having significant and/or very little backlogs.

### c. Milestones

See Backlog Reduction milestone table below.

### d. Means of Measurement of Success

- Number of requests pending past the twenty-day statutory time limit out of all pending requests
- Percentage of such requests out of all pending requests
- Average number of days pending of such requests
- Range of number of days pending of such requests

4) **FOIA Training.** VA currently utilizes Department of Justice (DOJ) courses to provide training for FOIA Officers and staff. These courses are available only at certain times during the year and class size is limited. As a result, when a FOIA staff turnover occurs, there is often a lag in providing appropriate training for the replacement staff member.

### a. Goals, Objectives, and Improvements Sought

VA FOIA office staffs need consistent, organization specific training to ensure that a well-informed staff is in place. FOIA Officers and staff need to have an updated handbook that addresses how to process FOIA requests and training that will teach them how to accurately determine which organization is the custodian of the specific records and/or files being sought. VA will request that DOJ provide customized training as they have offered to do for other agencies. VA will also explore developing component-specific training to address those issues that individual administrations or offices face, including the distinction between "sensitive" and "exempt."

### b. Steps Planned or Taken

- Review existing personnel job series and position descriptions for FOIA Officers and other FOIA Personnel
- Establish baseline of skills and knowledge for FOIA officers.
- Establish a requirement for annual training and awareness initiatives.
- Design or commission a comprehensive FOIA training program targeted for all primary and alternate VA FOIA Officers. (This training will include detailed guidance on how to properly complete and submit the Annual FOIA Report and specifically address "expedited" processing, which is widely misunderstood and misreported by the field.)
- Investigate web-based and/or video training.
- Implement Training of FOIA Officials and Staff.

### c. Milestones

See Training milestones table below.

### d. Means of Measurement of Success

Successful completion of items listed in E.3.b.


## 5) FOIA Customer Service and Communications

### a. Goals, Objectives, and Improvements Sought)

VA is evaluating information that is posted on the FOIA website to; 1) educate the public about the FOIA generally; 2) explain the requirements that the request be in writing, over the signature of the requester, and must contain a reasonable description of the requested record; 3) describe the agency's FOIA operations so that requesters have a better understanding of how their requests are processed.

VA is evaluating ways to improve; 1) communication with FOIA requestors; 2) public accessibility to FOIA staff; 3) responsiveness.

### b. Steps Planned or Taken

- Improve customer information (refine web site, develop and distribute printed materials)
- Standardize the Initial Notice of Determination response
- Create FOIA Requester Service Centers and Public Liaisons
- Gather customer feedback
- Respond and make improvements to identified areas

### c. Milestones

See Customer Service and Communications milestones at table below.

**d. Means of measurement of success**

- Analyze external stakeholder feedback

## 6) Technology & Automation

**a.** Goals, Objectives, and Improvements Sought

VA FOIA operations are decentralized, and each organization has its method of tracking FOIA requests. VA intends to acquire an IT solution that provides the capabilities to track FOIA requests by field location name and is accessible to each FOIA Service Center and the ACFO. The FOIA tracking system could also be designed to flag overdue requests and provide enhanced search capabilities. The FOIA log should be able to generate information needed to complete the annual FOIA report for each organization. Eventually customers may be able to access the web to inquire about the status of their requests.

**b. Steps Planned or Taken**

- Research and review existing internal VA FOIA software products
- Research and review existing Government Off-the-Shelf (GOTS) FOIA software products
- Research and review existing Customer Off-the-Shelf (COTS) FOIA software products
- Implement selected software product solution

**c. Milestones**

See Technology and Automation milestones at table below.

**d. Means of Measurement of Success**

- Implementation of the selected FOIA solution
- Post implementation review
- Training

## F. For the entire plan, group the improvement areas into the following time periods:

**1) Areas anticipated to be completed by December 31, 2006** (✓ *indicates complete*)

- ✓ Designate the VA ACFO
- ✓ Establish Department-wide FOIA work-group (VHA, VBA, NCA, Staff Officer Representative, GC, IT and Web Staff members)
- ✓ Conduct Preliminary Assessment of VA's FOIA Program
- ✓ Identify problems, deficiencies and recommendations

- ✓ Present findings to ACFO
- ✓ Draft revised and updated agency regulations and policies
- ▪ Conduct FOIA site visits

1) **Areas anticipated to completed by December 31, 2007**

   - ▪ Identify New Resource and Funding Requirements
   - ▪ Finalize & publish revised/updated agency regulations and policies
   - ▪ Analyze annual FOIA report to identify offices with backlogs
   - ▪ Solicit and analyze in-depth backlog data call from selected field facilities
   - ▪ Examine procedures in offices with backlogs
   - ▪ Identify frequently requested records and post them on the VA FOIA web site
   - ▪ Identify possible solutions to FOIA Backlog
   - ▪ Develop a plan to reduce FOIA Backlog
   - ▪ Implement Proposed backlog solutions
   - ▪ Establish centralized FOIA office (VACO)
   - ▪ Review existing personnel job series and position descriptions for FOIA Officers and other FOIA Personnel
   - ▪ Establish baseline skills and knowledge for FOIA Officers
   - ▪ Design a comprehensive FOIA Training Program targeted for all primary and alternate VA FOIA Officers
   - ▪ Establish Training Requirements
   - ▪ Investigate web-based and/or video training
   - ▪ Implement Training of FOIA Officials and Staff
   - ▪ Continue FOIA site visits

2) **Areas anticipated to be completed after December 31, 2008**

   - ▪ Improve customer information (refine web site develop and distribute printed materials)
   - ▪ Gather customer feedback
   - ▪ Respond and make improvements to identified areas
   - ▪ Research and review existing VA FOIA software products
   - ▪ Research and review existing GOTS FOIA software products
   - ▪ Research and review existing COTS FOIA software products
   - ▪ Implement selected software product solution
   - ▪ Revise FOIA Policy, Procedures and Standards
   - ▪ Implement Operational Changes
   - ▪ Review and assess Training Requirements
   - ▪ Continue FOIA site visits

The following "preliminary" milestones have been established as required by the Executive Order and correlate directly to the Section B.

# Tab A

# FOIA Implementation Plan Milestones

# (Chronological)

# CY 2006 FOIA Implementation Plan Milestones

| ID | Improvement Area | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|---|
| 06-1 | Organization Structure | Designate VA Agency Chief FOIA Officer | 6/14/2006 | 8/2/2006 | ✓ |
| 06-2 | Organization Structure | Establish Depart-wide FOIA Working Group | 6/14/2006 | 8/2/2006 | ✓ |
| 06-3 | Governance | Conduct Preliminary Assessment of VA's FOIA Program | 6/14/2006 | 9/27/2006 | ✓ |
| 06-4 | Governance | Identify problems, deficiencies and recommendations | 6/14/2006 | 9/27/2006 | ✓ |
| 06-5 | Governance | Present findings to ACFO | 6/14/2006 | 11/3/2006 | ✓ |
| 06-6 | Customer Service & Communications | Standardize Initial Notice of Determination response | 11/20/2006 | 12/31/2006 | ✓ |
| 06-7 | Governance | Draft revised and updated agency regulations and policies | 11/20/2006 | 12/31/2006 | ✓ |
| 06-7 | Backlog & Governance | Implement Quarterly Backlog Snapshot reporting requirements for all field activities | 11/8/2006 | 11/27/2006 | ✓ |
| 06-8 | Backlog | Analyze Quarterly Backlog Snapshots to identify offices with significant backlogs | 11/30/2006 | 12/15/2006 | ✓ |
| 06-9 | Backlog | Identify its 10 oldest FOIA requests and provide estimated completion dates using Snapshot data | 11/30/2006 | 12/15/2006 | ✓ |
| 06-10 | Backlog | Conduct FOIA site Visits | 12/1/2006 | 12/31/2006 | ✓ |
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# CY 2007 FOIA Implementation Plan Milestones

| ID | Improvement Area | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|---|
| 07-1 | Governance | Identify new resources and funding requirements | 1/1/2007 | 2/1/2007 | |
| 07-2 | Governance | Finalize & publish revised/updated agency regulations and policies | 2/1/2007 | 3/1/2007 | |
| 07-3 | Backlog | Analyze annual FOIA report to identify offices with backlogs | 2/1/2007 | 3/1/2007 | |
| 07-4 | Backlog | Solicit and analyze in-depth backlog data call from selected field facilities | 2/15/2007 | 3/15/2007 | |
| 07-5 | Backlog | Examine procedures in offices with backlogs | 2/1/2007 | 3/1/2007 | |
| 07-6 | Backlog | Identify frequently requested records and post them on the VA FOIA web site | 3/1/2007 | 10/1/2007 | |
| 07-7 | Backlog | Identify possible backlog solutions | 3/1/2007 | 5/1/2007 | |
| 07-8 | Backlog & Governance | Continue FOIA site Visits | 3/1/2007 | 5/1/2007 | |
| 07-9 | Backlog | Develop a plan to reduce FOIA Backlog | 5/1/2007 | 5/15/2007 | |
| 07-10 | Backlog | Implement Proposed backlog solutions | 5/15/2007 | 6/1/2007 | |
| 07-11 | Governance | Create FOIA Requester Service Centers and Public Liaisons | 6/1/2007 | 7/15/2007 | |
| 07-12 | Organization Structure | Establish a FOIA Processing Organization (VA FOIA Office) | 6/1/2007 | 7/15/2007 | |
| 07-13 | Governance | Review existing personnel job series and position descriptions for FOIA Officers and other FOIA Personnel | 6/1/2007 | 7/15/2007 | |
| 07-14 | Training | Establish baseline skills and knowledge for FOIA Officers | 7/1/2007 | 8/1/2007 | |
| 07-15 | Training | Establish a requirement for annual training and awareness initiatives | 7/15/2007 | 8/1/2007 | |
| 07-16 | Training | Design a comprehensive FOIA Training Program targeted for all primary and alternate VA FOIA Officers | 8/1/2007 | 10/1/2007 | |
| 07-17 | Training | Investigate web-based and/or video training | 8/1/2007 | 10/12007 | |
| 07-18 | Training | Implement Training of FOIA Officials and Staff | 10/1/2007 | 12/31/2007 | |

# CY 2008 FOIA Implementation Plan Milestones

| ID | Improvement Area | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|---|
| 08-1 | Customer Service & Communications | Improve customer information (refine web site develop and distribute printed materials) | 1/1/2008 | 1/31/2008 | |
| 08-2 | Customer Service & Communications | Gather customer feedback | 1/1/2008 | 1/31/2008 | |
| 08-3 | Customer Service & Communications | Respond and make improvements to identified areas | 2/1/2008 | 3/1/2008 | |
| 08-4 | Technology & Automation | Research and review existing internal VA FOIA software products | 3/1/2008 | 4/1/2008 | |
| 08-5 | Technology & Automation | Research and review existing GOTS FOIA software products | 4/1/2008 | 5/1/2008 | |
| 08-6 | Technology & Automation | Research and review existing COTS FOIA software products | 5/1/2008 | 6/1/2008 | |
| 08-7 | Technology & Automation | Implement selected software product solution | 6/1/2008 | 9/1/2008 | |
| 08-8 | Governance | Revise FOIA Policy, Procedures and Standards | 9/1/08 | 10/31/08 | |
| 08-9 | Organization Structure | Implement Operational Changes | 11/1/08 | 12/31/08 | |
| 08-10 | Training | Review and assess Training Requirements | 9/1/08 | 12/31/08 | |
| 08-11 | Backlog & Governance | Continue FOIA site Visits | 1/1/08 | 12/31/08 | |
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**Tab B**

**FOIA Implementation Plan Milestones**

**(By Improvement Area)**

# FOIA Implementation Plan Milestones

## Organization Structure Milestones

| ID | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|
| 06-1 | Designate VA Agency Chief FOIA Officer | 6/14/2006 | 8/2/2006 | ✔ |
| 06-2 | Establish Depart-wide FOIA Working Group | 6/14/2006 | 8/2/2006 | ✔ |
| 07-10 | Establish a FOIA Processing Organization (VA FOIA Office) | 6/1/2007 | 7/15/2007 | |
| 08-9 | Implement Operational Changes | 11/1/08 | 12/31/2008 | |

## Governance Milestones

| ID | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|
| 06-3 | Conduct Preliminary Assessment of VA's FOIA Program | 6/14/2006 | 9/27/2006 | ✔ |
| 06-4 | Identify problems, deficiencies and recommendations | 6/14/2006 | 9/27/2006 | ✔ |
| 06-5 | Present findings to ACFO | 6/14/2006 | 11/3/2006 | ✔ |
| 06-7 | Draft revised and updated agency regulations and policies | 11/20/2006 | 12/31/2006 | ✔ |
| 07-1 | Identify new resources and funding requirements | 1/1/2007 | 2/1/2007 | |
| 07-2 | Finalize & publish revised/updated agency regulations and policies | 2/1/2007 | 3/1/2007 | |
| 07-9 | Create FOIA Requester Service Centers and Public Liaisons | 6/1/2007 | 7/15/2007 | |
| 07-11 | Review existing personnel job series and position descriptions for FOIA Officers and FOIA Personnel | 6/1/2007 | 7/15/2007 | |
| 07-17 | Continue Assessment of VA's FOIA Program | 1/1/2007 | 12/31/2007 | |
| 08-11 | Continue FOIA site Visits | 1/1/08 | 12/31/08 | |

| ID | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|
| 08-8 | Revise FOIA Policy, Procedures and Standards | 9/1/08 | 10/31/08 | |

## Backlog Reduction Milestones

| ID | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|
| 06-8 | Implement Quarterly Backlog Snapshot reporting requirements for all field activities | 11/8/2006 | 11/27/2006 | ✔ |
| 06-9 | Analyze Quarterly Backlog Snapshots to identify offices with significant backlogs | 11/30/2006 | 12/15/2006 | ✔ |
| 06-10 | Identify its 10 oldest FOIA requests and provide estimated completion dates using Snapshot data | 11/30/2006 | 12/15/2006 | ✔ |
| 06-11 | Conduct FOIA site Visits | 12/1/2006 | 12/31/2006 | ✔ |
| 07-3 | Analyze annual FOIA report to identify offices with backlogs | 2/1/2007 | 3/1/2007 | |
| 07-4 | Examine procedures in offices with backlogs | 2/1/2007 | 3/1/2007 | |
| 07-5 | Identify possible backlog solutions | 3/1/2007 | 5/1/2007 | |
| 07-6 | Conduct FOIA site Visits | 3/1/2007 | 5/1/2007 | |
| 07-7 | Develop a plan to reduce FOIA Backlog | 5/1/2007 | 5/15/2007 | |
| 07-8 | Implement Proposed backlog solutions | 5/15/2007 | 6/1/2007 | |

## Training Milestones

| ID | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|
| 07-12 | Establish baseline skills and knowledge for FOIA Officers | 7/1/2007 | 8/1/2007 | |
| 07-13 | Establish a requirement for annual training and awareness initiatives | 7/15/2007 | 8/1/2007 | |
| 07-14 | Design a comprehensive FOIA Training Program targeted for primary and alternate VA FOIA Officers | 8/1/2007 | 10/1/2007 | |
| 07-15 | Investigate web-based and/or video training | 8/1/2007 | 10/12007 | |

| 07-16 | Implement Training of FOIA Officials and Staff | 10/1/2007 | 12/31/2007 | |
| 08-10 | Review and assess Training Requirements | 9/1/08 | 12/31/2008 | |

## Customer Service & Communications Milestones

| ID | Action to be Completed | Start | Finish | Complete |
|----|------------------------|-------|--------|----------|
| 06-6 | Standardize Initial Notice of Determination response | 11/20/2006 | 12/31/2006 | ✔ |
| 08-1 | Improve customer information (refine web site develop and distribute printed materials) | 1/1/2008 | 1/31/2008 | |
| 08-2 | Gather customer feedback | 1/1/2008 | 1/31/2008 | |
| 08-3 | Respond and make improvements to identified areas | 2/1/2008 | 3/1/2008 | |

## Technology & Automation Milestones

| ID | Action to be Completed | Start | Finish | Complete |
|----|------------------------|-------|--------|----------|
| 08-4 | Research and review existing internal VA FOIA software products | 3/1/2008 | 4/1/2008 | |
| 08-5 | Research and review existing GOTS FOIA software products | 4/1/2008 | 5/1/2008 | |
| 08-6 | Research and review existing COTS FOIA software products | 5/1/2008 | 6/1/2008 | |
| 08-7 | Implement selected software product solution | 6/1/2008 | 9/1/2008 | |

# CY 2007 FOIA Implementation Plan Milestones

| ID | Improvement Area | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|---|
| 07-1 | Governance | Identify new resources and funding requirements | 1/1/2007 | 2/1/2007 | |
| 07-2 | Governance | Finalize & publish revised/updated agency regulations and policies | 2/1/2007 | 3/1/2007 | |
| 07-3 | Backlog | Analyze annual FOIA report to identify offices with backlogs | 2/1/2007 | 3/1/2007 | |
| 07-4 | Backlog | Solicit and analyze in-depth backlog data call from selected field facilities | 3/1/2007 | 4/1/2007 | |
| 07-5 | Backlog | Examine procedures in offices with backlogs | 2/1/2007 | 3/1/2007 | |
| 07-6 | Backlog | Identify frequently requested records and post them on the VA FOIA web site | 3/1/2007 | 10/1/2007 | |
| 07-7 | Backlog | Identify possible backlog solutions | 3/1/2007 | 5/1/2007 | |
| 07-8 | Backlog & Governance | Continue FOIA site Visits | 3/1/2007 | 5/1/2007 | |
| 07-9 | Backlog | Develop a plan to reduce FOIA Backlog | 5/1/2007 | 5/15/2007 | |
| 07-10 | Backlog | Implement Proposed backlog solutions | 5/15/2007 | 6/1/2007 | |
| 07-11 | Governance | Create FOIA Requester Service Centers and Public Liaisons | 6/1/2007 | 7/15/2007 | |
| 07-12 | Organization Structure | Establish a FOIA Processing Organization (VA FOIA Office) | 6/1/2007 | 7/15/2007 | |
| 07-13 | Governance | Review existing personnel job series and position descriptions for FOIA Officers and other FOIA Personnel | 6/1/2007 | 7/15/2007 | |
| 07-14 | Training | Establish baseline skills and knowledge for FOIA Officers | 7/1/2007 | 8/1/2007 | |
| 07-15 | Training | Establish a requirement for annual training and awareness initiatives | 7/15/2007 | 8/1/2007 | |
| 07-16 | Training | Design a comprehensive FOIA Training Program targeted for all primary and alternate VA FOIA Officers | 8/1/2007 | 10/1/2007 | |
| 07-17 | Training | Investigate web-based and/or video training | 8/1/2007 | 10/12007 | |
| 07-18 | Training | Implement Training of FOIA Officials and Staff | 10/1/2007 | 12/31/2007 | |

## CY 2008 FOIA Implementation Plan Milestones

| ID | Improvement Area | Action to be Completed | Start | Finish | Complete |
|---|---|---|---|---|---|
| 08-1 | Customer Service & Communications | Improve customer information (refine web site develop and distribute printed materials) | 1/1/2008 | 1/31/2008 | |
| 08-2 | Customer Service & Communications | Gather customer feedback | 1/1/2008 | 1/31/2008 | |
| 08-3 | Customer Service & Communications | Respond and make improvements to identified areas | 2/1/2008 | 3/1/2008 | |
| 08-4 | Technology & Automation | Research and review existing internal VA FOIA software products | 3/1/2008 | 4/1/2008 | |
| 08-5 | Technology & Automation | Research and review existing GOTS FOIA software products | 4/1/2008 | 5/1/2008 | |
| 08-6 | Technology & Automation | Research and review existing COTS FOIA software products | 5/1/2008 | 6/1/2008 | |
| 08-7 | Technology & Automation | Implement selected software product solution | 6/1/2008 | 9/1/2008 | |
| 08-8 | Governance | Revise FOIA Policy, Procedures and Standards | 9/1/08 | 10/31/08 | |
| 08-9 | Organization Structure | Implement Operational Changes | 11/1/08 | 12/31/08 | |
| 08-10 | Training | Review and assess Training Requirements | 9/1/08 | 12/31/08 | |
| 08-11 | Backlog & Governance | Continue FOIA site Visits | 1/1/08 | 12/31/08 | |
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